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April 9, 2018

VIA ECF

The Honorable John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Jane Doe v. City of New York, et. al., 15 Civ. 9137 (JGK)

Your Honor:

I am a Senior Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, representing defendants City of New York, Ismael Figueroa and Gerard Philogene in the above-referenced matter. I write jointly with plaintiff's counsel to respectfully request that the court conference scheduled in this matter for April 11, 2016 at 10:30 a.m. be adjourned to a date at the Court's convenience. The parties have conferred and suggest April 26 or 27, 2018 for the conference.

The reason for defendants' request is that at the present time I am scheduled to appear before Judge Schofield in Ruben An v. City of New York, 16 CV 5381 (LGS) for a conference at the same exact time on April 11, 2018, though a motion to adjourn that conference has been filed for reasons unrelated to this matter. Also, I am scheduled to take plaintiff's deposition in Herrera (Collazo) v. The City of New York, et. al., 17 CV 4047 (RJS), at 1:30 p.m. on April 11th, a deposition that has been difficult to schedule. Plaintiff's counsel has a personal matter on April 11, 2018, that conflicts with the scheduled conference.

This is the first such request for an adjournment.

Thank you for your consideration herein.

Respectfully submitted,

/s/
Mark D. Zuckerman
Senior Counsel

cc: Robert J. Marinelli, Esq. (via ECF)